
PROPOSAL FOR ROP DATA FIELDS FOR MONITORING AND REPORTING NON-FISH TRANSFERS

WCPFC-TCC21-2025-17D

8 September 2025

Submitted by the ROP-IWG Chair

Purpose

1. This paper reports on progress on WCPFC21 taskings to the ROP-IWG and proposes updates to the ROP Minimum Standard Data Fields (MSDF) to consider including new data fields for monitoring and reporting non-fish transfers (e.g. provisions, fuel, bait, personnel) as part of transshipment reporting.
2. It also provides updated information on the key points from the discussion on this paper at the ROP-IWG6 meeting along with additional comments provided by CCMs considering potential non-fish transfer data fields, noting consideration as to whether non-fish transfer are to be required is to be considered separately by TCC12 and the Commission rather than the ROP-IWG.

Updated information

3. The following key points on the proposed approach to address current issues with the MSDFs and their use in CCFS were noted from the ROP-IWG6 discussions on 20 June 2025.

- There was strong caution expressed about the potential reporting burden that could arise from requiring detailed observer reporting of non-fish transfers. Reference was made to the experience of the NPFC, where flag States and the Secretariat reportedly had to manage over 5,000 such records annually.
- Some participants suggested that observer reporting should be limited to noting that a non-fish transfer event occurred, including identification of the two vessels involved, without recording further details about the type of supplies or personnel exchanged.
- Clarification was sought and received from the Secretariat that the current discussion focused specifically on observer MSDFs. It was confirmed that under the minimalist approach adopted by NPFC, it would be sufficient for observers to identify that a non-fish transfer occurred, and which vessels were involved, without providing detailed inventory of items exchanged.

- It was recommended that observers simply mark the occurrence of non-fish transfers during their deployments to distinguish such events from regular fish transshipments, thereby supporting compliance oversight without overburdening data collection.
- A view was expressed that, in light of increasing trafficking and other illicit activities in Pacific fisheries, observers should be required to record all transfers taking place—similar to current requirements during purse seine and longline observer trips. This would contribute to broader monitoring and enforcement objectives in the region.

4. The Chair of the ROP-IWG invited participants to provide written feedback. The following comments were received from CCMs.

JAPAN:

5. Japan supports the view expressed during ROP-IWG06 that observer reporting should be limited to noting that a non-fish transfer event occurred, including identification of the two vessels involved, without recording further details about the type of supplies or personnel.

Background

6. At WCPFC21 in December 2024, the Commission tasked the ROP-IWG with discussing the addition of non-fish transfers to the [observer minimum data fields for monitoring transshipment](#) (WCPFC21 Summary Report paragraph 511). This followed discussions during the review of the Transshipment CMM ([CMM 2009-06](#)), which highlighted the challenges in identifying and understanding these transfers. The review also identified the need for enhanced reporting which is critical for validating and verifying activities within the Convention Area.

The Proposal

7. In 2024, a proposal was submitted to the Transshipment IWG to amend Annexes I and III of the Transshipment CMM. These Annexes list the required information for WCPFC Transshipment Declaration and Notices (Notifications) to the Executive Director. The proposed amendments were as follows:
 - In Annex 1 (Declaration) - *“7. Did non-fish transfer occur? (yes or no”) If yes, provide details of this non-fish transfer, including the exchange of crew (numbers) and provision of supplies between vessels. “*
 - In Annex 3 (Notification) – *“7. Will non-fish transfers occur? (“Yes” or “No”). If yes, provide details of this proposed non-fish transfer, including the exchange of crew (numbers) and provision of supplies between vessels.”*
 - To include a footnote to define ‘non-fish transfer’ based on the North Pacific Fisheries Commission (NPFC) CMM definition – *““means a transfer of fuel, gear, materials, or other supplies, or a transfer of at least one person, from one fishing vessel to another fishing vessel in the Convention Area”*
8. The proposal aims to improve monitoring of interactions at sea where no fish were transferred but other activities occurred—such as the exchange of crew or supplies. Capturing this data would help verify such encounters and reduce potential compliance queries, especially as the Secretariat continues to develop tools to detect vessel proximity.
9. Although the Commission has yet to fully consider changes to CMM 2009-06, assigning this task to the ROP-IWG is a step toward identifying necessary data and assessing how additional reporting might impact observer programmes.

Refresh of CCM consideration at ROP-IWG05¹

10. The tasking to the ROP-IWG was briefly discussed at the ROP-IWG05 meeting April 2025 and the following points raised:
 - General support to revising the [observer minimum data fields for monitoring transshipment](#) in response to the tasking.
 - Recalling that the discussions at TCC in 2024, had identified that bait is also “fish”, and the importance of having clear phrasing and/or specific guidance.
 - Desirability of WCPFC considering harmonizing with other RFMOs, noting that ICCAT uses “supply services” as the equivalent of “non-fish transfers”, and IOTC has adopted an explicit definition of “non-catch transfer”.

¹ [Chairs Summary Report of Meeting 5 of ROP-IWG](#)

- An interest in reviewing other changes to the [observer minimum data fields for monitoring transshipment](#), for example SP_number which is currently non-mandatory.
11. There was also brief reference to the appropriateness of the name ‘non-fish transfers’.

Discussion Points for ROP-IWG

12. The following points are provided to support ROP-IWG discussion. They reflect the proposal on non-fish transfers submitted to TCC20, initial discussion and outcomes from ROP_IWG5 and the tasking to consider harmonisation with other RFMOs.

- I. Definition of Non-Fish Transfer
The proposed definition—drawing on the NPFC’s approach—lists specific items such as fuel, gear, and materials, and includes a broader reference to “other supplies.” Standard interpretation suggests that “other supplies” would be of a similar nature to those specifically listed. One issue for TCC consideration is whether “bait” should be explicitly included within this definition.
- II. CCMs should note that a high-level review of other RFMOs reveals they share similar approaches to reporting requirements for non-fish transfers. These typically involve confirming whether such transfers took place, identifying the time and location, and specifying the type of supplies exchanged. Examples include:
 - NPFC - Requires reporting and records of reporting on “Other Transfer Activities” between fishing vessels, including the timing and location of the transfer.
 - IOTC, ICCAT and CCSBT - Refer to “Supply services” and require a “Supply Declaration” between a carrier and another vessel. These declarations generally include details on the goods supplied, such as fuel, bait, provisions, spare parts, medical supplies, and the transfer of passengers or crew.
 - SPRFMO - Mentions transfers of fuel, crew, gear, or any other supplies between vessels.

13. While these requirements are directed at flag CCM reporting, they provide valuable insight into the types of information that might be considered by the ROP-IWG as the basis for categorizing and capturing through observer data fields for consistent and effective monitoring.

Next Steps

14. The ROP-IWG Chair requests further feedback on this paper and this will be used to further consider proposals for changes to [observer minimum data fields for monitoring transshipment](#) and the formulation of other recommendations related to “other supplies”.